

MICHAEL T. NIXON, ESQ.
Nevada Bar No. 12839
SANDY VAN, ESQ.
Nevada Bar No. 10785
VAN LAW FIRM
1290 S. Jones Blvd.
Las Vegas, NV 89146
(702) 529-1011 Telephone
(702) 800-4662 Facsimile
michael@vanlawfirm.com
sandy@vanlawfirm.com
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LESLIE ANN TREJO, GUADALUPE
RODRIGUEZ, and MANUEL RODRIGUEZ,
individuals,

Plaintiffs,

vs.

AMERICAN FAMILY INSURANCE
COMPANY, a Foreign Corporation; DOE
EMPLOYEES I-V and ROE COMPANIES I-V,

Defendants.

CASE NO. 2:20-cv-02039-APG-EJY

STIPULATION AND ORDER TO
EXTEND DISCOVERY

(THIRD REQUEST)

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, LESLIE ANN TREJO, GUADALUPE RODRIGUEZ, and MANUEL RODRIGUEZ (collectively, "Plaintiffs"), by and through their attorneys of record Michael Nixon, Esq., and Sandy Van, Esq., of VAN LAW FIRM; and Defendant AMERICAN FAMILY INSURANCE COMPANY ("Defendant"), by and through its counsel of record Scott A. Flinders, Esq., of HUTCHISON & STEFFEN, PLLC, hereby agree and stipulate for an order extending the time to extend discovery as set forth herein pursuant pursuant to LR 26-3 and LR IA 6-1:

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I. DISCOVERY COMPLETED

The Parties have engaged in diligent discovery in this matter. To date, the following discovery has been completed:

- Plaintiffs served their initial disclosures pursuant to FedRCivP 26(a)(1) on January 7, 2021.
- Defendant served its initial disclosures pursuant to FedRCivP 26(a)(1) on January 22, 2021.
- Defendants propounded Interrogatories and Requests for Production to Plaintiffs, Leslie Ann Trejo, Guadalupe Rodriguez, and Manuel Rodriguez on December 8, 2020. Plaintiffs responded to the Interrogatories and Requests for Production on January 11, 2021.
- Plaintiffs propounded Interrogatories, Requests for Admission and Requests for Production to Defendant on February 22, 2021. Defendants responded to the Interrogatories, Requests for Admission and Requests for Production on April 7, 2021.
- Defendant has taken the depositions of Plaintiffs Guadalupe Rodriguez and Manuel Rodriguez.
- The parties have disclosed their initial experts.

II. DISCOVERY REMAINING

The parties intend to proceed with the following:

- The retention and disclosure of the parties' rebuttal experts.
- The deposition of the Plaintiff Leslie Trejo, the Person Most Knowledgeable from American Family Insurance Company, other potentially relevant witnesses and the parties' experts.
- Additional written discovery.

III. REASONS FOR CONTINUANCE

Due to the COVID-19 pandemic, it is necessary that discovery deadlines be continued to allow for appropriate safety measures to be taken. Due to mandatory business closures, service of process and production of records are expected to take longer than usual. Also, party depositions have not been taken. In light of the difficulties incurred associated with the COVID-19 pandemic, the parties now request that discovery deadlines be extended.

Here, good cause exists. The parties have been actively conducting discovery. Additional time is needed to allow counsel for Plaintiff and Defendant to conduct the remaining discovery relevant to this matter. Consequently, the parties have agreed to another sixty (60) day extension of the remaining discovery deadlines in order to allow them sufficient time to complete the same.

IV. PROPOSED SCHEDULE

The parties respectfully request that the foregoing proposed new dates listed below:

Event	Current Date	Proposed Date
Discovery Cut-Off Date	10/18/2021	12/17/2021
Amend Pleadings or Add Parties	CLOSED	CLOSED
Expert Witness Disclosure	CLOSED	CLOSED
Rebuttal Expert Disclosures	09/20/2021	11/19/2021
Dispositive Motions	11/17/2021	01/18/2022
Joint Pretrial Order	12/17/2021	02/15/2022
Stipulation or Motion to Extend Discovery	08/27/2021	10/26/2021

IT IS HEREBY STIPULATED

Dated this 1st day of September, 2021.

VAN LAW FIRM

Dated this 1st day of September, 2021.

HUTCHISON & STEFFEN, PLLC

/s/ Sandy Van, Esq.

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SANDY VAN, ESQ.

Nevada Bar No. 10785

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Las Vegas, NV 89146

(702) 529-1011 Telephone

(702) 800-4662 Facsimile

michael@vanlawfirm.com

sandy@vanlawfirm.com

Attorneys for Plaintiffs

/s/ Scott A. Flinders, Esq.

SCOTT A. FLINDERS, ESQ.

Nevada Bar No. 6975

Peccole Professional Park

10080 West Alta Drive, Suite 200

Telephone: 702-385-2500

sflinders@hutchlegal.com

Attorney for Defendant,

American Family Insurance Company

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Stipulation and Order to Extend Discovery
(Third Request)

ORDER

Upon Stipulation by counsel for the parties, and good cause appearing therefore, **IT IS HEREBY ORDERED** that the discovery deadlines be extended as follows:

Event	New Deadlines
Discovery Cut-Off Date	12/17/2021
Amend Pleadings or Add Parties	CLOSED
Expert Witness Disclosure	CLOSED
Rebuttal Expert Disclosures	11/19/2021
Dispositive Motions	01/18/2022
Joint Pretrial Order	02/15/2022
Stipulation or Motion to Extend Discovery	10/26/2021

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: September 2, 2021

Prepared and submitted by:

VAN LAW FIRM

/s/ Sandy Van, Esq.

MICHAEL T. NIXON, ESQ.

Nevada Bar No. 12839

SANDY VAN, ESQ.

Nevada Bar No. 10785

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Las Vegas, NV 89146

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sandy@vanlawfirm.com

Attorneys for Plaintiffs,
Leslie Ann Trejo, Guadalupe Rodriguez,
and Manuel Rodriguez

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Phone: (702) 529-1011 Fax: (702) 800-4662
Email: info@vanlawfirm.com

